

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PETROBRAS SECURITIES
LITIGATION

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: Case No. 14-cv-9662 (JSR)

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: **CLASS ACTION**
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**NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Unopposed Motion for Preliminary Approval of Class Action Settlement, dated February 1, 2018, the accompanying Declaration of Jeremy A. Lieberman, dated February 1, 2018, and the exhibits attached thereto, and all prior papers and proceedings herein, Lead Plaintiff Universities Superannuation Scheme Ltd., acting as sole corporate trustee for Universities Superannuation Scheme and named plaintiffs North Carolina Department of State Treasurer and the Employees' Retirement System of the State of Hawaii (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, through their undersigned attorneys, will move this Court, before the Honorable Jed S. Rakoff, on a date and at such time as may be designated by the Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, NY 10007, for an order: (1) preliminarily approving the Settlement; (2) certifying the Settlement Class; (3) certifying Plaintiffs as Class Representatives and Lead Counsel as Class Counsel; and (4) setting a date for a Settlement Hearing and deadlines for the mailing and publication of the Notices, the filing of Settlement

Class Member objections, the filing of Settlement Class Member opt-out notices, and the filing of Lead Counsel's application for attorneys' fees and expenses and for an incentive award to Plaintiffs.¹

Dated: February 1, 2018

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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¹ All capitalized terms not defined herein have the meaning assigned to them in the Stipulation of Settlement and Release, dated February 1, 2018, attached as Exhibit I to the Declaration of Jeremy A. Lieberman, dated February 1, 2018.